



Georgia, and removed by Defendants to the Northern District of Georgia, Atlanta Division (D.E 1). As grounds for this motion, Defendants state as follows<sup>1</sup>:

1. Plaintiffs filed the Complaint in the Superior Court of Fulton County, State of Georgia against Defendants based on insurance policies that were sold to Georgia citizens in connection with small loans originated by World Acceptance Corporation a/k/a World Finance Corporation (“World”). *See generally* Complaint.

2. Each of Plaintiffs’ three proposed classes is based on “Georgia citizens” who used World as their “agent in the State of Georgia.” *Id.* at ¶ 147(i)-(iii).

3. On September 16, 2015, Defendants timely filed a Notice of Removal, removing this purported class action under the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1332(d), and 28 U.S.C. §§ 1441 and 1446. (D.E. 1). In the Notice of Removal, Defendants explained that this Court has subject matter jurisdiction under section 1332(d) because: (i) this was a class action, in which (ii) there are at least 100 members in the Plaintiffs’ proposed class, (iii) members of the plaintiff class were citizens of a state different from any defendant and members of the plaintiff class were citizens of a foreign state and Defendants were

---

<sup>1</sup> A proposed order is attached hereto as Exhibit A.

a citizen of a State, and (iv) the aggregate value of the claims exceeds \$5,000,000. (D.E. 1, at \*3-4).

4. On September 28, 2015, Plaintiffs filed a Motion to Remand and Memorandum of Law in Support, seeking to have the case remanded to the Superior Court of Fulton County. (D.E. 4). In pertinent part, Plaintiffs argued that the case should be remanded because Defendants could not prove that minimal diversity existed under 28 U.S.C. § 1332(d)(2). (D.E. 4, at \*5-10).

5. Under 28 U.S.C. § 1332(d)(2)(B), minimal diversity is met when “any member of a class of plaintiffs is a foreign state or a citizen or subject of a foreign state and any defendant is a citizen of a State.” 28 U.S.C. § 1332(d)(2)(B)

6. To establish the facts pertaining to the foreign citizenship of certain members of Plaintiff’s proposed class, Defendants submit two exhibits that contain restricted information under Federal Rule of Civil Procedure 5.2. *See American General Life Ins. Co. v. Margolis Family I, LLC*, No. 1:07-cv-230-JEC, 2008 WL 857436, at \*2 (N.D. Ga. Mar. 28, 2008) (granting motion for leave to file documents under seal where the Court “found that the documents filed under seal contain confidential information”) (citation omitted).

WHEREFORE, Defendants respectfully move this Honorable Court for leave to file under seal “Exhibit 1” and “Exhibit 2” submitted in support of Defendants’ Opposition to Motion To Remand.

Respectfully submitted this 13th day of October, 2015.

/s/ Alexander B. Feinberg  
Alexander B. Feinberg  
GA Bar No.: 956505  
Maynard, Cooper & Gale, P.C.  
*Attorney for Life of the South  
Insurance Company and Insurance  
Company of the South*

OF COUNSEL:

**Maynard, Cooper & Gale, P.C.**  
1901 Sixth Avenue North,  
Suite 2400  
Regions/Harbert Plaza  
Birmingham, AL 35203  
Phone: (205) 254-1000  
Facsimile: (205) 254-1999

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(D)**

Pursuant to N.D. Ga. Local Rule 7.1(D), the undersigned counsel certifies the foregoing Motion for Leave to File Opposition to Motion to Remand Exhibits Under Seal has been prepared with 14 point Times New Roman Font, which is one of the font and point selections approved by the Court in Local Rule 5.1(B).

/s/ Alexander B. Feinberg  
Alexander B. Feinberg  
MAYNARD, COOPER & GALE, P.C.  
1901 Sixth Avenue North,  
Suite 2400  
Regions/Harbert Plaza  
Birmingham, AL 35203  
Phone: (205) 254-1000  
Facsimile: (205) 254-1999

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of October, 2015, I served a copy of the foregoing on all parties and/or counsel of record by using the CM/ECF system and/or U.S. Mail, postage prepaid and properly addressed, as follows:

E. Adam Webb  
Matthew Klase  
1900 The Exchange, S.E.  
Suite 480  
Atlanta, Georgia 30339  
Phone: (770) 444-0998  
Fax: (770) 217-9950  
Adam@WebbLLC.com  
Matt@Webb LLC.com

Hassan A. Zaverreei  
Jeffrey Kaliel  
TYCKO & ZAVAREEI LLP  
2000 L Street, N.W.  
Suite 8080  
Washington, D.C. 20036  
Phone: (202) 973-0900  
Fax: (202) 973-0950  
hzavareei@tzlegal.com  
jkaliel@tzlegal.com

**Attorneys for Plaintiffs**

/s/ Alexander B. Feinberg  
**OF COUNSEL**